

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Anthony Daunt, *et al*

Plaintiffs,

Case No.: 19-cv-00614-JTN-ESC

v

Hon. Janet T. Neff
Magistrate Judge Ellen S. Carmody

Jocelyn Benson, in her official capacity as
Michigan Secretary of State,

Defendant.

**PROPOSED INTERVENOR-DEFENDANT'S
MOTION FOR LEAVE TO INTERVENE**

**** EXPEDITED CONSIDERATION REQUESTED****

NOW COMES Proposed Intervenor-Defendant Count MI Vote (d/b/a "Voters Not Politicians"), a Michigan non-profit corporation, by and through its attorneys Fraser Trebilcock Davis & Dunlap, P.C., and for its Motion for Leave to Intervene pursuant to Fed. R. Civ. P. 24(b) states as follows:

1. For the reasons explained in the accompanying brief, which are incorporated by reference, the requirements for permissive intervention under Fed. R. Civ. P. 24(b) and (c) have been satisfied and permissive intervention is properly granted.
2. Expedited consideration has been requested pursuant to LCivR 7.1(e) because Plaintiffs have filed a Motion for Preliminary Injunction with the Complaint in this matter. (Doc. 4, PageID#53-92). Voters Not Politicians seeks expedited consideration of its motion for permissive intervention so that it may be allowed to timely respond to Plaintiffs' Motion for Preliminary Injunction.

3. Pursuant to LCivR 7.1(d), Voters Not Politicians has attempted to ascertain whether this motion will be opposed. A separately filed certificate has been submitted that sets forth in detail the efforts that were taken to comply with the obligations created by LCivR 7.1(d).

WHEREFORE, Proposed Intervenor-Defendant Count MI Vote (d/b/a "Voters Not Politicians") respectfully requests that this Honorable Court GRANT its Motion for Leave to Intervene pursuant to Fed. R. Civ. P. 24(b) and enter an order that permits it to participate as a Defendant in this matter.

Respectfully submitted,

Fraser Trebilcock Davis & Dunlap, P.C.
Attorneys for Proposed Intervenor-Defendant
Count MI Vote, d/b/a Voters Not Politicians

Dated: August 12, 2019

By: /s/Ryan K. Kauffman
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AND

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

Respectfully submitted,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.

Attorneys for Proposed Intervenor-Defendant

Count MI Vote d/b/a Voters Not Politicians

Dated: August 12, 2019

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